

EXHIBIT A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

BLAKE LIVELY,

Movant,

v.

No. 3:25-mc-63

THE SKYLINE AGENCY LLC and ROZA
KALANTARI,

Respondents.

**BLAKE LIVELY'S MOTION TO COMPEL THE SKYLINE AGENCY LLC AND ROZA
KALANTARI TO PRODUCE DOCUMENTS WITHHELD ON PRIVILEGE GROUNDS**

Pursuant to Federal Rules of Civil Procedure 45(d)(2)(i) and 45(e)(2), Plaintiff and Movant Blake Lively hereby moves to compel non-parties and Respondents The Skyline Agency and Roza Kalantari (the “Skyline Parties”) to produce the documents withheld from their production in response to subpoenas issued by Ms. Lively on the basis of privilege assertions. This Motion is made on the following grounds: Ms. Lively issued third-party subpoenas to each of the Skyline Parties pursuant to Federal Rule of Civil Procedure 45. The Skyline Parties responded to the subpoenas but withheld certain documents as subject to the attorney-client privilege, attorney work-product doctrine, and the common interest privilege, which they described on a second amended privilege log served July 24, 2025. The Skyline Parties’ privilege assertions are meritless, and the documents withheld are not subject to any privilege. The documents must therefore be produced.

This Motion is based on Ms. Lively’s concurrently filed brief and appendix; all pleadings, records, and filings in the above-captioned case; all matters of which the Court shall take judicial notice; and on such argument as may be presented at any hearing on this Motion.

RELIEF SOUGHT

Ms. Lively respectfully requests that the Court grant her motion to compel and order production of such documents within three calendar days of the date of such Order.

Respectfully submitted,

Dated: August 6, 2025

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CERTIFICATE OF CONFERENCE

On April 4, 2025, Kristin Bender, counsel for Blake Lively, conferred by telephone with Skyline's counsel to discuss the scope of the subpoena to the Skyline Parties. This began a three-month-long conferral process between Ms. Lively's counsel and the Skyline Parties' counsel, as further set forth in the Declaration of Kristen E. Bender. *See Appendix A.* On July 24, 2025, the Skyline Parties transmitted their second amended privilege log, which Ms. Lively understands to be their final position on the privilege claims contested in this Motion.

Dated: August 6, 2025

/s/ Samuel T. Mallick
Samuel T. Mallick
Attorney for Movant Blake Lively

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via CM/ECF on August 6, 2025.

Notice of this filing and service will be sent in accordance with the Federal Rules of Civil Procedure.

Dated: August 6, 2025

/s/ Samuel T. Mallick
Samuel T. Mallick
Attorney for Movant Blake Lively

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BLAKE LIVELY,

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No. 3:25-mc-63

THE SKYLINE AGENCY LLC and ROZA
KALANTARI,

Respondents.

[PROPOSED] ORDER

Upon consideration of the motion by Blake Lively to compel non-parties and Respondents The Skyline Agency and Roza Kalantari (the “Skyline Parties”) to produce the documents withheld from their production in response to the subpoenas issued by Ms. Lively, any opposition(s) thereto, and the entire record herein, it is hereby **ORDERED** that:

1. Blake Lively’s motion to compel is **GRANTED**.
2. The Skyline Parties shall produce the withheld documents within three days of the date of this Order.

SO ORDERED.

Signed on _____, 2025.

ORDER GRANTING BLAKE LIVELY’S MOTION TO COMPEL